

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:19-cv-00394-BO

PAUL JONES AND MARK FITZHENRY, )  
ON BEHALF OF THEMSELVES AND )  
ALL OTHERS SIMILARLY SITUATED, )  
 )  
PLAINTIFFS, )  
 )  
v. )  
 )  
SAFE STREETS USA LLC, ACQUITY, )  
LLC and TEKTIKS INNOVATIVE )  
NETWORK USA INC, )  
 )  
DEFENDANTS. )

**NOTICE OF SETTLEMENT**

Plaintiffs hereby notify the Court that the parties have reached an agreement in principle to settle the litigated claims in this case on a class-wide basis, subject to Court approval. The parties are presently drafting a written Settlement Agreement and related documents in advance of seeking preliminary approval. Plaintiffs will file the Settlement Agreement and related documents with the Court as part of a Motion for Preliminary Approval by August 2, 2021.

Based on the foregoing, the parties respectfully request that all current deadlines be suspended pending the filing of the proposed Settlement Agreement.

Dated: July 2, 2021

Respectfully submitted,

*/s/ Avi R. Kaufman*

---

Avi R. Kaufman, Florida State Bar # 84382  
Kaufman P.A.  
400 NW 26<sup>th</sup> Street  
Miami, FL 33127  
Telephone: (305) 469-5881  
Email: kaufman@kaufmanpa.com

Anthony I. Paronich

Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
[o] (617) 485-0018  
[f] (508) 318-8100  
anthony@paronichlaw.com

*Counsel for Plaintiffs*

/s/ Ted Johnson  
Ted Lewis Johnson  
North Carolina State Bar # 39791 PO  
Box 5272  
Greensboro, NC 27435  
Telephone: (336) 252-8596  
Email: tedlewisjohnson@tedlewisjohnson.com

*Local Civil Rule 83.1(d) Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 2, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Avi R. Kaufman